



improper expert testimony. Plaintiffs cannot make such objections until the witness testimony and exhibit are proffered at trial.

Also, some objections listed below are to parts of voluminous exhibits (i.e. claim notes) which contain certain entries with impermissible legal conclusions, expert opinions, hearsay, etc., while other parts of the exhibit are otherwise admissible.

Notwithstanding the foregoing, Plaintiffs make the following objections.

<b>No.</b>	<b>Exhibit Description</b>	<b>Basis for Objection</b>
2.	Insurance claim file summary prepared by State Farm	Incomplete; Hearsay; Cumulative
3.	Insurance claim notes prepared by State Farm	Hearsay; Need for Personal Knowledge; Improper Expert Opinion, Improper Legal Conclusions; Cumulative
4.	Insurance claim notes generated by internal State Farm system	Hearsay; Need for Personal Knowledge; Improper Expert Opinion, Improper Legal Conclusions, Cumulative
9.	October 29, 2021 correspondence to Oklahoma Insurance Department from State Farm	Relevance; Improper Legal Conclusions; Cumulative
172	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative
173.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative
174.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative
175.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative
176.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative
177.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative
178.	Calls with Insureds (since 02/26/2022) Notes prepared by Ian's Enterprise LLC	Relevance; Cumulative

180.	Calls with Valor Notes prepared by Ian's Enterprise LLC	Relevance; Cumulative
181.	Text Messages between Ian's Enterprise LLC and Plaintiffs	Relevance; Cumulative
182.	Text Messages between Ian's Enterprise LLC and Plaintiffs	Relevance; Cumulative
184.	Text Messages between Ian's Enterprise LLC and Chad Williams	Relevance; Cumulative
185.	Text Messages between Ian's Enterprise LLC and Doron Hoggatt	Relevance; Hearsay
186.	Text Messages between Ian's Enterprise LLC and Justin Gentry	Relevance; Hearsay
187.	Text Messages between Ian's Enterprise LLC and Doreen Rupert	Relevance; Hearsay; Cumulative
188.	October 4, 2021 email correspondence between- Plaintiffs and Ian Enterprise LLC	Relevance; Cumulative
199.	June 3, 2021 Recording of Inbound Call from Valor Forensic Services to Ian's Enterprise LLC	Relevance; Cumulative
200.	June 6, 2021 Recording of Inbound Call from Valor Forensic Services to Ian's Enterprise LLC	Relevance; Cumulative
201.	March 21, 2022 Recording of Outbound Call to Plaintiffs from Ian's Enterprise LLC	Relevance; Cumulative
202.	April 6, 2022 Recording of Outbound Call to Plaintiffs from Ian's Enterprise LLC	Relevance; Cumulative
203.	Expert Report of Richard Windham with Accompanying Materials	Hearsay, Lack of Foundation, Need for Personal Knowledge; Impermissible Legal Conclusions
204.	Documents received via Subpoena Duces Tecum from We Buy Homes LLC aka Sell My Fixer Upper	Relevance; Hearsay; Cumulative
208.	All other documents which are or have been produced by Plaintiffs or by State Farm as part of discovery in the litigation which are not objected to by State Farm	Objections reserved until exhibits appropriately identified
209.	Discovery responses, answers, and objections received from Plaintiffs	Cumulative

210.	Any documents produced in response to a Subpoena Duces Tecum issued by a party	Objections reserved until specific document identified
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Respectfully submitted,

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